

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TRUSTEES OF THE 1199/SEIU GREATER:
NEW YORK BENEFIT FUND, TRUSTEES OF:
THE 1199/SEIU GREATER NEW YORK:
PENSION FUND, TRUSTEES OF THE:
1199/SEIU GREATER NEW YORK:
EDUCATION FUND, TRUSTEES OF THE:
1199/SEIU GREATER NEW YORK CHILD:
CARE FUND, TRUSTEES OF THE 1199/SEIU:
GREATER NEW YORK JOB SECURITY:
FUND, and THE TRUSTEES OF THE:
1199/SEIU GREATER NEW YORK WORKER:
PARTICIPATION FUND, :

Civil Action No.
07 CV 9744 (DLC)

Plaintiffs,

v.

KINGSBRIDGE HEIGHTS REHABILITATION:
CARE CENTER, :

Defendant.

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AFFIDAVIT OF HANAN B. KOLKO

Hanan B. Kolko, being duly sworn, states:

1. My name is Hanan B. Kolko. I am a Director and Shareholder at the law firm of Meyer, Suozzi, English & Klein, P.C.
2. I attach as Exhibit 1 to my affidavit a June 8, 2006 agreement between 1199 SEIU United Healthcare Workers East ("1199"), Kingsbridge Heights Rehabilitation and Care Center ("Kingsbridge") and the National Labor Relations Board ("NLRB").
3. I attach as Exhibit 2 to my affidavit a July 30, 2008 decision of NLRB Law Judge Steven Fish in Kingsbridge Heights, 29-CA-2702.

4. I attach as Exhibit 3 to my affidavit pages 11 and 12, 16 and 17, 30 through 40, 63 and 64, and 66 and 67 of the August 6, 2008 deposition of Helen Sieger.


5. In response to Plaintiffs Request for Production of Documents, defendant produced "Union Reports" for the months of July, 2007 through and including October 2007. Defendant produced no reports for the months of November, 2007 through and including February, 2008.

6. Kingsbridge paid contributions due on December 12, 2006 for all Funds except for the Benefit Fund on August 13, 2008.

7. Kingsbridge paid contributions due on January 10, 2007 on August 13, 2008.


HANAN B. KOLKO

Sworn to before me this
15th day of August, 2008


Notary Public

MARGARITA DEJESUS CUEVAS
Notary Public, State Of New York
No. 01DE6061968
Qualified In Nassau County
Commission Expires July 23, 2009